

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ROY-G-BIV Corporation,

Plaintiff,

v.

ABB Inc., MEADWESTVACO TEXAS, LP
and MEADWESTVACO CORPORATION,

Defendants.

Case No. 6:11-cv-00622-LED

Judge Leonard E. Davis

**JOINT MOTION TO EXTEND STAY OF ALL DEADLINES
PENDING FINALIZATION OF SETTLEMENT**

Plaintiff ROY-G-BIV Corporation and Defendants ABB Inc., Meadwestvaco Texas, LP and Meadwestvaco Corporation (“Defendants”) (collectively, the “Parties”) hereby submit this joint motion and provide notice to the Court pursuant to the Court’s Standing Order Regarding Proper Notification of Settlement to the Court and its Order Granting Motion to Stay All Deadlines (Dkt. 485) (“Order”). The Order stayed all deadlines through September 19, 2014.

The Parties have executed a confidential settlement agreement resolving all matters in controversy between the Parties. The agreement provides for filing of dismissal documents in this Court and the Federal Circuit no later than September 29. Based on this agreement, the Parties request that the Court extend the stay of all deadlines until and through September 30, 2014 so that the necessary dismissal papers can be filed.

WHEREFORE, the Parties respectfully request that the Court grant this joint motion and extend the temporary stay of all applicable deadlines until and through September 30, 2014.

Dated: September 19, 2014

Respectfully submitted,

/s/ Richard S. Meyer
D. Michael Underhill
Richard S. Meyer
Patrick M. Lafferty
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, NW
Washington, DC 20015
202-237-2727
202-237-6131 (Fax)
munderhill@bsfllp.com
rmeyer@bsfllp.com
plafferty@bsfllp.com

Russell A. Chorush
Texas State Bar No. 24031948
HEIM, PAYNE & CHORUSH, L.L.P.
JP Morgan Chase Tower
600 Travis Street, Suite 6710
Houston, Texas 77002
(713) 221-2000
(713) 221-2021 (Fax)
rchorush@hpcllp.com

Gregory P. Love
Texas Bar No. 24013060
STEVENS LOVE
P. O. Box 3427
Longview, Texas 75606-3427
903-753-6760
903-753-6761 (Fax)
greg@stevenslove.com

Lance Lubel
Texas Bar No. 12651125
Adam Q. Voyles
Texas Bar No. 24003121
LUBEL VOYLES, LLP
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
713-284-5200
713-284-5250 (Fax)
lance@lubelvoyles.com
adam@lubelvoyles.com

By: /s/ Steven M. Auvil
Steven M. Auvil (Ohio Bar No. 0063827)
(Admitted E.D. Tex)
steven.auvil@squiresanders.com
Bryan J. Jaketic (PHV)
bryan.jaketic@squiresanders.com
John J. Thuermer (Ohio Bar No. 0087638)
(Admitted E.D. Tex)
john.thuermer@squiresanders.com
SQUIRE SANDERS (US) LLP
4900 Key Tower
127 Public Square
Cleveland, Ohio 44114
Telephone: (216) 479-8023
Facsimile: (216) 479-8780

Jeremy W. Dutra (PHV)
jeremy.dutra@squiresanders.com
SQUIRE SANDERS (US) LLP
1200 19th Street, NW, Suite 300
Washington, DC 20036
Telephone: (202) 626-6600
Facsimile: (202) 626-6780

Michael E. Jones (Texas Bar No. 10929400)
mikejones@potterminton.com
POTTER MINTON
A Professional Corporation
110 N. College Ave., Suite 500
Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

Attorneys for Defendants
ABB Inc., MEADWESTVACO TEXAS, LP and
MEADWESTVACO
CORPORATION

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff conferred with counsel for Defendants, who do join this motion.

/s/ Gregory P. Love
Gregory P. Love

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 19, 2014.

/s/ Gregory P. Love

Gregory P. Love